Wolff & Samson PC
One Boland Drive
West Orange, New Jersey 07052
(973) 325-1500
Attorneys for Defendant Time Warner Cable Inc.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

HAROLD M. HOFFMAN, individually and on behalf of those similarly situated,

Plaintiff.

- against -

TIME WARNER CABLE INC.,

Defendant.

Civil Action: 2:12-cv-00978-ES-CLW

APPLICATION FOR AN EXTENSION OF TIME TO ANSWER, MOVE, RESPOND, OR OTHERWISE REPLY

DOCUMENT ELECTRONICALLY FILED

Application is hereby made pursuant to Local Rule 6.1 for a Clerk's Order extending the time within which defendant Time Warner Cable Inc. ("Defendant") may answer, move, respond, or otherwise reply to the Complaint filed by plaintiff herein and it is represented that:

- 1. No previous extension has been obtained.
- 2. Defendant received a copy of the initial pleading in this action on or about January 24, 2012.
- 3. Defendant filed a timely notice of removal with the United States District Court for the District of New Jersey on February 17, 2012.
- 4. Pursuant to F.R.C.P. 81, time to answer, move, respond, or otherwise reply expires on February 24, 2012.

5. Pursuant to Local Rule 6.1(b), the time within which to answer or reply may, before its first expiration and with or without notice, be extended once for a period not to exceed 14 days on order granted by the Clerk.

WHEREFORE, Defendant requests that the time within which it may answer, move, respond, or otherwise reply to the Complaint be extended 14 days to March 9, 2012.

WOLFF & SAMSON PC Attorneys for Defendant Time Warner Cable Inc.

By: /s/ William E. Goydan
WILLIAM E. GOYDAN

Dated: February 23, 2012

| <u>ORDER</u> | |
|--|-------------------------|
| The above application is ORDERED GRANTED extended to | |
| ORDER DATED | |
| | WILLIAM T. WALSH, Clerk |
| | By: |
| Dated: February, 2012 | |

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a true copy of this pleading has been filed and served electronically this date upon:

William T. Walsh, Clerk United States District Court for the District of New Jersey Martin Luther King, Jr. Federal Bldg. & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Philip C. Chronakis, Esq. Chronakis Siachos, LLC 50 Harrison Street Suite 315 Hoboken, New Jersey 07030 Attorney for Plaintiff

Harold M. Hoffman, Esq. 240 Grand Avenue Englewood, New Jersey 07631 Attorney for Plaintiff

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

WOLFF & SAMSON PC Attorneys for Defendant Time Warner Cable Inc.

By: /s/ Mindy P. Fox
MINDY P. FOX

Dated: February 23, 2012